

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

DOUGLAS M. LOY,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:18-cv-1162-L0/JFA
)	
THE DIOCESE OF ARLINGTON, et al.,)	
)	
Defendants.)	

DEFENDANTS' OBJECTIONS TO PLAINTIFF'S PRETRIAL DISCLOSURES

COME NOW the defendants, The Diocese of Arlington and St. Agnes Catholic School, by counsel, and note certain objections to plaintiff's PreTrial Disclosures pursuant to the Pretrial Order:

WITNESSES

Defendants object to any witnesses who were not properly identified in discovery pleadings. From the plaintiff's answers to interrogatories and the initial disclosures, it appears that the following witnesses identified in paragraph I.B. of the plaintiff's PreTrial Disclosures were not properly identified in discovery:

1. Melanie Krynitsky and Judy Smith.

EXHIBITS

1. Exhibit no. 2 is objected to on the grounds that proper foundation is required prior to admission; inadmissible hearsay; and, based on information set forth in the face of the document that it is not intended to provide an exact calculation of potential pension benefits, and lawful discharge of the plaintiff as an employee.

2. Exhibit nos. 6 and 7 are objected to on the grounds of lack of foundation and inadmissible hearsay.

3. Exhibit no. 12 is objected to on the grounds of lack of foundation, and inadmissible hearsay.

4. Exhibit nos. 14, 15 and 16 are objected to on the grounds of lack of foundation, and inadmissible hearsay.

5. Exhibit no. 22 is objected to on the grounds that the documents contain inadmissible hearsay and opinions of others.

6. Exhibit no. 26 is objected to on the grounds of hearsay, relevance, and lack of foundation.

7. Exhibit no. 34 is objected to on the grounds of hearsay, lack of foundation.

8. Exhibit nos. 35, 36 and 37 are objected to on the grounds that the identification is non-specific as to which interrogatory answers plaintiff may seek to introduce with regard to exhibit nos. 35 and 36 and, therefore, all objections are preserved to any of these documents; and the identification fails to put the defendants on notice of what information plaintiff seeks to introduce. With regard to exhibit no. 37, plaintiff has insufficiently identified any portions of a transcript and defendants are not on notice of what information plaintiff seeks to introduce; and witnesses' transcripts or deposition testimony is inadmissible absent certain circumstances, not identified herein.

**THE DIOCESE OF ARLINGTON and
ST. AGNES CATHOLIC SCHOOL**

By Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on July 8, 2019, I electronically filed the foregoing pleading with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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